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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☒ Affects Pacific Gas and Electric Company
☐ Affects both Debtors

** All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF LAURIE J. EDELSTEIN
IN SUPPORT OF REORGANIZED
DEBTORS' PARTIAL OBJECTION TO
PROOF OF CLAIM NO. 64095 FILED BY
TIGER NATURAL GAS, INC.**

Response Deadline:

January 4, 2021, 4:00 p.m. (Pacific Time)

Hearing Information If Timely Response Made:

Date: January 18, 2022

Time: 10:00 a.m. (Pacific Time)

Place: (Tele/Videoconference Appearances Only)

United States Bankruptcy Court

Courtroom 17, 16th Floor

San Francisco, CA 94102

1 I, Laurie J. Edelstein, pursuant to section 1746 of title 28 of the United States Code, hereby
2 declare under penalty of perjury that the following is true and correct to the best of my knowledge,
3 information, and belief:

4 1. I am an attorney at law licensed to practice in the State of California and admitted to the
5 bar of this Court. I am a partner at Jenner & Block LLP, counsel for PG&E Corporation (“**PG&E**
6 **Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as debtors and reorganized debtors
7 (collectively, “**PG&E**” or the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases. Unless
8 stated otherwise, I have personal knowledge of the matters set forth herein. I submit this Declaration in
9 support of the *Reorganized Debtors’ Partial Objection to Claim No. 64095 filed by Tiger Natural Gas,*
10 *Inc.* [Docket No. 11700] (the “**Objection**”).¹

11 2. Attached for the Court’s convenience as Exhibit A is a true and correct copy of the Proof
12 of Claim filed by Tiger Natural Gas, Inc. (“**Tiger**”), Claim No. 64095, filed on October 18, 2019.

13 3. Attached hereto as Exhibit B is a true and correct copy of PG&E Gas Schedule G-1.

14 4. Attached hereto as Exhibit C is a true and correct copy of *Opinion* issued by the
15 California Public Utilities Commission (“**CPUC**”) in *Application of Pacific Gas and Electric Company*
16 *for Authority to Change Core Procurement Rates on a Monthly Basis*, CPUC Decision No. 97-10-065,
17 1997 Cal. PUC LEXIS 973 (Oct. 22, 1997).

18 5. Attached hereto as Exhibit D is a true and correct copy of Pacific Gas and Electric
19 Company Advice Letter 4034-G (November 1, 2018 Gas Core Procurement Rate Changes), filed with
20 the CPUC on October 25, 2018.

21 6. Attached hereto as Exhibit E is a true and correct copy of *Decision Authorizing Pacific*
22 *Gas and Electric Company’s 2015-2018 Revenue Requirement for Gas Transmission and Storage*
23 *Services and Adopting Interim Rates*, , CPUC Decision No. 16-06-056, 2016 Cal. PUC LEXIS 381 (June
24 23, 2016).

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26
27 ¹ Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the
28 Objection.

7. Attached hereto as Exhibit F is a true and correct copy of *Decision Authorizing Pacific Gas and Electric Company's 2019-2022 Revenue Requirement for Gas Transmission and Storage*, CPUC Decision No. 19-09-025, 2019 Cal. PUC LEXIS 467 (Sept. 12, 2019).

8. Attached hereto as Exhibit G is a true and correct copy of Pacific Gas and Electric Company Advice Letter 3446-G (January 1, 2014 Gas Core Procurement and Transportation Rate and Tariff Changes), filed with the CPUC on December 24, 2013.

9. Attached hereto as Exhibit H is a true and correct copy of Pacific Gas and Electric Company Advice Letter 3546-G (January 1, 2015 Gas Core Procurement and Transportation Rate and Tariff Changes), filed with the CPUC on December 23, 2014.

10. Attached hereto as Exhibit I is a true and correct copy of Pacific Gas and Electric Company Advice Letter 3666-G (January 1, 2016 Gas Core Procurement and Transportation Rate and Tariff Changes), filed with the CPUC on December 23, 2015.

11. Attached hereto as Exhibit J is a true and correct copy of Pacific Gas and Electric Company Advice Letter 3793-G (January 1, 2017 Gas Core Procurement and Transportation Rate and Tariff Changes), filed with the CPUC on December 23, 2016.

12. Attached hereto as Exhibit K is a true and correct copy of the *Order Denying Motion to Dismiss* entered in the District Court Action on October 25, 2017.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury and in accordance with laws of the United States of America that the foregoing is true and correct. Executed this fifteenth day of December, 2021, in San Francisco, California.

/s/ Laurie J. Edelstein
Laurie J. Edelstein